

partner is WSE Investment, LLC, a Delaware limited liability company. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores, East, LLC fka Wal-Mart Stores East, Inc.,² an Arkansas limited liability company. The sole member of Wal-Mart Stores, East, LLC is Walmart Inc. fka Wal-Mart Stores, Inc., a Delaware corporation. The principle place of business for all entities mentioned is 702 S.W. 8th Street, Bentonville, Arkansas 72716.

Jurisdiction is conferred under 28 U.S.C. § 1332 relating to diversity of citizenship of the parties. The parties are citizens of different states. Plaintiffs seek \$275,000 in damages, which is in excess of the federal jurisdictional requisite.

Plaintiffs' complaint was filed on September 28, 2022. Wal-Mart was served on October 3, 2022. It has been less than thirty (30) days since Wal-Mart was served the summons and complaint. This Notice of Removal is timely filed as set forth in 28 U.S.C. § 1446(b). On October 6, 2022, plaintiffs filed an amended complaint in the Circuit Court for Bradley County, Tennessee. Plaintiffs' amended complaint is attached hereto as Exhibit C.

WHEREFORE, Wal-Mart hereby gives Notice of the removal of this action pending in the Circuit Court for Bradley County, Tennessee, to the United States District Court for the Eastern District of Tennessee, Chattanooga Division, and requests that the proceedings be held thereon.

²Wal-Mart Stores East, Inc. was converted to an Arkansas limited liability company on January 25, 2011.

s/ Greg Callaway
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served via U.S. Mail upon Robert G. Norred, Jr., Logan-Thompson, P.C., P.O. Box 191, Cleveland, TN 37364-0191; on this 28th day of October, 2022.

s/ Greg Callaway

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